

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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MMM: F1I"H - \* - ; ?I"JK"1 - 4ZN"NF4J ; #\* ["K - \ J4N"F1I"  
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?J ; ?\*LNMJ ; :: VD

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C"L:N:?:"d"@SVTa'>a@D> :: @T  
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## INTRODUCTION

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**Section 19: Restrictions on Identification Documents for Official Purposes**

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\*(h\$U(6\$7"X.) , +(00"8)2."H&(= ' \$67"+5\$ " Z )R%&"%0"L9).=)7" # \$%& ' ( )7"U%2.= "Q\$"

/ & ( 3 ( , ) ..R" .) Q. \$ "0%&"X&%9(=( , ' "NX) , (65B+%B I , ' .(65"+& ) , 6.)+(% , "6\$&9(/\$6"0%&"5(6"

0&(\$ , =6")+" /52&/57"+5\$ " &% /\$&R"6+%&\$7"+5\$=" /+%&]6" ) , ="=\$ , +(6+]6"%00(/\$7") , ="6% // \$&"

+%2& , ) 3 \$ , +6:"<\$ / .:"%0"8)2."H&(= ' \$6"rr"P7"YB@D7")++) /5\$=")6" I c:"V:"" 1 \$7").% , ' "U(+5"

X.) , +(006"H\$ , e) 3 ( , "NX\$( ' 5+7" I9\$&( + " 1 % U\$7"8)2."` : " I=U)&=67") , ="N5)&% , " #&2 , \$&7"

/ %2.= "0) / \$ / & ( 3 ( , ) . / % , 6\$ \_2\$ , / \$6"0%&" ' (9( , ' "&(\$6"+%"+5\$(&"0&(\$ , =67") , \$( ' 5Q%&67") , ="

0\$ .%U"X)&(65(% , \$&6:"<\$ / .6:"%0"H\$ , e) 3 ( , "NX\$( ' 5+"rr"YBT7")++) /5\$=")6" I c:"Yj" I9\$&( + "

1 % U\$ "rr"VBT7 )++) /5\$=")6" I c:"Tj"8)2." I=U)&=6"rr"EBC7")++) /5\$=")6" I c:"Cj"N5)&% , "

#&2 , \$&"rr"SBT7 )++) /5\$=")6" I c:"W:""F5%6\$6) 3 \$ / & ( 3 ( , ) . / % , 6\$ \_2\$ , / \$6"U%2.=)XX.R"

+%"` ) , \$ "<%\$ "s@7"U5%="&(9\$6"5\$&"526Q) , ="+"=" /+%&]6")XX%( , + 3 \$ , +6") , ="X5R6(/) ."

+5\$&)XR"0%..%U( , ' ) , "( , /)X) / (+) + ( , ' "( , e2&R"+5) + "5\$ "6200\$&\$=":"<\$ / .:"%0" ` ) , \$ "<%\$ "s@ "r"

S7")++) /5\$=")6" I c:"@D:""K%&"( , 9(+ , ' "0&(\$ , =6"( , +%"+5\$(&"5% 3 \$6") , ="X&%9(=( , ' "+5\$ 3 "

U(+5") "X.) / \$ "+% "6+)R7"8.) , +(006"H&(= ' \$6") , =" #&2 , \$&" .(h\$U(6\$")&\$")+"&(6h"%0"/ & ( 3 ( , ) ."

X&%6\$/2+(% , : "H&(= ' \$6"<\$ / .:"r"@Vj"N5)&% , " #&2 , \$&"<\$ / .:"r"Y:

M , "+5(6"U)R7"N\$ /+(% , "T") 3 %2 , +6"+%) "6/5\$ 3 \$ "0%&"=\$+\$& 3 ( , ( , ' ) , ="X2 , (65( , ' "

2 , .)U02."X&\$6\$ , /\$( , "+5\$ "6+) + \$ "+5&%2 ' 5"+5\$ "%X&)+(% , "%0"6+) + \$ " / & ( 3 ( , ) .) U6:"" - 6"

=(6/266\$=")Q%9\$7"+5\$ / % , =(+(% , 6") , ="X\$ , .) + (\$6")66% / ( ) + \$="U(+5"+5\$ "\$ , +&R"( , +%") , ="

/ % , + ( , 2\$="X&\$6\$ , / \$ "%0" , % , B / (+ (^ \$ , 6" ( , "+5\$ "L , (+\$="N+) + \$6")&\$" / % , 6+(+2+(% , ) ..R"

&\$6\$&9\$="+" +5\$ "0\$=\$&)." ' %9\$& , 3 \$ , +:"DeCanas7"EPE"L:N:")+"SVW:"" [ \$+7"N\$ /+(% , "T]6"





v. *Evans* C@C"K:"N2XX:"@EET7"@EVTBVC aZ:<:" - .):"@WWS>"afF%")..%U"\$)/5"6+)+\$"+%"  
 (3 X%6\$("+6"%U, "=2+(\$6"), ="&\$\_2(&\$ 3 \$, +6" ' %9&&, (, "'+5\$(",+&\$6+)+\$"+&), 6 3 (66(% , "%0"  
 3)+&\$&().)QR"/% 3 3 %, "/)&&(\$&6"U%2.="&\$62.+(, "X&\$/(6\$.R"+5\$"+RX\$"%0"X(\$/\$ 3 \$).  
 &\$' 2.)+(%, "+5)+ " ?%, '&\$66"U), +\$="+%)9%=(, "X)66(, "'+5\$ - /+:g>:"

**c. HB 87's Alien Registration Law Conflicts With Federal Law and Will Result in Unlawful Harassment of Lawfully Present Aliens**

N\$/+(%, "C"\$00\$/+(9\$.R"&\$\_2(&\$6").."(, =(9(=2).6"U5%")&\$"6+XX\$=" , "626X/(%, "%0"  
 ), R"/&(3(, .)"/+(9(+R"a(, /.2=(, "'&)00(/"9(%))+(%, 6"), ="%+5&&" 3 (6=\$ 3 \$), %&6">+"%"  
 X&%=2/\$)"=%/2 3 \$, "+5)+ "X&\$62 3 X+(9\$.R"\$6+)Q.(65\$6".)U02."X&\$6\$, /\$"(, "+5\$L, (+\$="N+)+\$6:" J : ? : # : - : "d"@TBVB@DDaQ>:"HR"&\$\_2(&(, "'(, =(9(=2).6"+% "X&\$6\$, "+%, "\$%0"+5\$6\$"  
 6X\$/ (0(\$="=%/2 3 \$, +6" # \$%&' () "5)6"/&\$)+\$="(+6"%U, ").(\$, "&\$' (6&)+(% , "6R6+\$ 3 :"" Cf."C"  
 L:N: ? : "d"@SDEa=>"a0\$=\$&).).(\$, "&\$' (6&)+(% , "6+)+2+\$>:" 1 H"CT"\$00\$/+(9\$.R"&\$\_2(&\$6").."  
 (, =(9(=2).6"(, "# \$%&' () "+%/)&&R")"6+)+\$B)XX&%9\$="(=\$, +(R"=%/2 3 \$, +(, "%&=\$&"+%"  
 )9%("=\$c+\$, =\$="X%.(/\$"\_2\$6+(%, (, "'\$)/5" +(3 \$"+5R"\$, /%2, +&\$".)U"\$, 0%&/ \$ 3 \$, +:"  
 F5%6\$ "U5%"=" , %+"X%66\$66"%&=" , %+"5)XX\$, "+% "Q\$"/)&&R(, "'% , "\$%0"+5\$="(=\$, +(R"  
 =%/2 3 \$, +6"X&\$0\$&&=\$"QR"# \$%&' () "U(.."Q\$"+&\$)+\$=")6"626X\$/+=\$="(. \$ ' ).).(\$, 6"), =)+"  
 &(6h"%0"X&%.% , '\$\$=\$+\$, +(%, ::"""""

F5\$ "N2X&\$ 3 \$ ? %2&+"5)6").&\$)=R"5\$.="+5)+6+)+\$).(\$, "&\$' (6&)+(% , ") , ="  
 =%/2 3 \$, +)+(% , "6/5 \$ 3 \$ 6")&\$"Q&%)=.R"X&\$ \$ 3 X+\$="M, "*Hines*7"+5\$"/%2&+(, 9).(=)+\$="

8\$, ,6R.9), (]6" - .(\$, "4\$ '(6+&)+(%, " - /+7"U5(/5"&\$\_2(&\$=7") 3%, ' "%+5\$&"+5(, ' 67"+5)+"  
\$9\$&R").(\$, "@C"R\$)&6"%&%"9\$&"+%"&\$/\$(\$9\$)"6+)+\$").(\$, "(=\$, +(0(/)+(%, "/)&=7"/)&&R"(+"+)".."  
+(3 \$67") ,="65%U"+5\$"/)&="U5\$, \$9\$&"+(" 3 )R"Q\$"=\$ 3 ) ,=\$="QR") , "%00(/\$&:""S@P"L:N:")+"  
VY:""F5\$" ?%2&+"0%2, ="+5)+7

1)9(, ' "+5\$"/%, 6+(+2+(%, ,).")2+5%&(+R"6%"+%"=%7"1?%, ' &\$66m"5)6"X&%9(=\$=" *a standard for alien registration in a single integrated and all-embracing system*" (, "%&=\$&"+%" %Q+)(, "+5\$"(, 0%&3 )+(%, "=\$3\$="+%" Q\$"=\$6(&)Q.\$"(", "/% , , \$/+(%, "U(+5").(\$, 6:" G 5\$, "(+ 3 )=\$"+5(6")==+(%, "+%"(+6" 2, (0%&3" , )+2&).(^(+%, " ) ,="(3 3 ('&)+(%, " .)U67"+"X.)(, .R" 3 ) , (0\$6+\$=" *a purpose to do so in such a way as to protect the personal liberties of law-abiding aliens through one uniform national registration system, and to leave them free from the possibility of inquisitorial practices and police surveillance:*"

*Id.*)+"TE"a\$ 3 X5)6(6")===\$>:""

1 H"CT]6" *de facto*"=%/2 3 \$, +)+(%, "&\$\_2(&\$ 3 \$, +(6"X)&+(/2.)&.R"X&%Q.\$ 3 )+(/"  
Q\$/)26\$" 3 ) , R"0%&\$\$( ' , , )+(%, , ).6"U5%"&\$6(=\$"(", "+5\$L , (+\$="N+)+\$6"U(+5"+5\$"

)++)/5\$=")6" I c:"M"+%"\* )2+\$&Q)/h" <\$/.::""F5\$", 2 3 Q\$&"%0"(,=(9(=2).6"(, "+5\$6\$"

6(+2)+(%, 6"(6"6( ' , (0(/) , +:""M, "0(6/)."R\$)&"PDDW7" 3 %&\$"+5) , "@E" 3 (..(% , ").(\$, 6"U\$&\$"

)= 3 (+\$="2, =\$&"5\$" \ (6)" G )(9\$&"8&% ' & ) 3 7" <\$/.::"%0" < )9(=" \ : " - ' 2(.)&"r"PE7"0(.\$="(", "

*United States v. Arizona* ; %:"@DB? \ B@E@S"a<:" - &(^:"0(.\$="` 2.R"Y7"PD@D>"a/%XR"

)++)/5\$=")6" I c:"`"+%"\* )2+\$&Q)/h" <\$/.:>7") , =" < 1 N"\$6+( 3 )+\$6"+5)+"2X"+%"PDD7DDD"

(,=(9(=2).6"U\$&\$".( ' (Q.\$"0%&" + \$ 3 X%& )&R"X&%+\$ /+\$="6+)+26"Q)6\$="6%.\$R"% , "+5\$"

=\$6( ' , )+(% , "%0" 1 )(+"=2\$"+% .)6+"R\$)&]6"\$)&+5\_2)h\$7"N+\$ ( , Q\$&' " <\$/.:."r"@W:""N2/5"

( , /&\$)6\$="X%.( /\$"( , +&26(% , "( , +% "+5\$".(9\$6"%0"+5\$6\$".)U02..R"X&\$6\$, +).(\$, 67") 3 % , ' "

%+5\$&67"(6"( 3 X\$& 3 (66(Q.\$:""See DeCanas7"EPE"L:N:)"+"SVC7" , :Y"af J 0"/%2&6\$7"6+)+\$"

&\$' 2.)+(% , " , %+" /% , ' &\$66(% , )..R"6) , /+(% , \$="5+)"=(6/&( 3 ( , )+\$6" ' ) ( , 6+).(\$, 6".)U02..R"

)= 3 (+\$="+"5\$"/%2 , +&R"(6"( 3 X\$& 3 (66(Q.\$"(0"(+"( 3 X%6\$6") ==(+(% , )."Q2&=\$ , 6" , %+"

/% , +\$ 3 X.)+\$="QR" ?% , ' &\$66:g>:"

**d. HB 87 Places an Impermissible Burden on Federal Resources and Interferes With Federal Immigration Enforcement**

1 H"CT"(6").6%"X&\$ \$ 3 X+\$="Q\$/ )26\$"(+"( 3 X%6\$6") , "( 3 X\$& 3 (66(Q.\$"Q2&=\$ , "% , "

0\$=\$&)."&\$6%2&/6"+5)"/&\$)+\$6"f%Q6+)/.\$16m"+%"5\$")//% 3 X.(65 3 \$ , +) , ="\$c\$/2+(% , "%0"

+5\$"02.."X2&X%6\$6") , ="%Qe\$/+(9\$6"%0" ?% , ' &\$66:g""Hines7"S@P"L:N:)"+"YTj"see *Egelhoff*

*v. Egelhoff ex rel. Breiner7"VSP"L:N:"@E@7"@VD aPDD@>"a5%.=( , ' "+5)"+f=(00\$&( , ' "6+)+\$"*

&\$' 2.)+(% , 6")00\$/+( , ' " ) , " I 4 MN - "X. ) , ]6"q6R6+\$ 3 "0%&"X&% /\$66( , '"/.) (3 6") , ="X)R( , ' "

Q\$, \$0(+6]"( 3 X%6\$"qX&\$/(6\$.R"+5\$"Q2&=\$, "+5)+ " I 4MN - "X&\$B\$ 3 X+(%, "U)6"(, +\$, =\$="+%")9% (=:]g>"a\_2%+(, "Fort Halifax Packing Co. v. Coyne"7"ECP"L:N:"@7"@D"a@WCT>>:

N\$/+(%, 6"C") ,="@S"U(..="(&\$/+R"2, =\$& 3 (, "\$0\$=\$&)." (3 3 (' &)+(%, "\$, 0%&/ \$ 3 \$, +" X&(%&+(\$6"QR"9)6+.R"(, /&\$)6(, "'+5\$", 2 3 Q\$&"%0"(3 3 (' &)+(%, "6+)+26"9\$&(0(/)+(%, " \_2\$&(\$6"+%"+5\$"0\$=\$&)." '%9\$&, 3 \$, +:"M, ")==+(%, "+%"5\$( 3 3 (' &)+(%, "\_2\$&(\$6" )2+5%&(^\$="QR"N\$/+(%, "C7"N\$/+(%, "@S" 3 ), =)+\$6"+5)")"9\$&(0(/)+(%, "&\$\_2\$6+"Q\$" 62Q 3 (+\$="+%"5\$"0\$=\$&)." '%9\$&, 3 \$, +"0%&"9\$&R"626X\$/+=\$="0%&\$(' , , )+(%, ). k &\$' )&=.\$66"%0"U5\$+5\$&"+5\$R")&\$"626X\$/+=\$="+%Q\$2, .)U02..R"X&\$6\$, +"%&", %+ k U5%"(6" /%, 0(, \$="0%&"), R"X\$&(=%"0"+(3 \$(, ")"/%2, +R"%&" 3 2, (/X)."e")., ="U5%"=%\$6", %+" 5)9\$"=%/2 3 \$, +6%", "5), ="+"\$6+)Q.(65"(3 3 (' &)+(%, "6+)+26:"" J : ? : # : - : "d"EPBEB@Ea/>:" - 6"=(6/266\$=")Q%9\$7").)&' \$", 2 3 Q\$&"%0"0%&\$('\$ , , )+(%, ).6"U(.."Q\$2, )Q.\$"+%"&\$)=(.R" =\$ 3 %, 6+&)+\$"+5\$(&.)U02."6+)+267"), =" 1 H"CT")2+5%&(^\$6"), "( 3 3 (' &)+(%, "(, 9\$6+(')+(%, " +5)+(", /.2=\$6"\_2\$&R(, "'+5\$"0\$=\$&)." '%9\$&, 3 \$, +(, (\$) /5"%0"+5\$6\$"/)6\$6:""

1 H"CT]6") /&%66B+5\$BQ%)&=")XX&%)/5"+%"( 3 3 (' &)+(%, "\$, 0%&/ \$ 3 \$, +"526" 2, =\$& 3 (, \$6"+5\$"0\$=\$&)." '%9\$&, 3 \$, +]6")Q.(+R"+%"0%/26%", "(+6"X&(%&+(\$67"(, /.2=(, "'+5\$" )XX&\$5\$, 6(%, "%0"+5\$ 3 %6+=), '\$&%26").(\$, 6:"" <\$/.:"%0<)"9(="?: 8). 3 )+(\$&"r"@C7"0(.=\$" (, "United States v. Arizona"7" ; %:"@DB?â B@ñ3 ) \ O \_O i æ O \_O i æ )R(6&""+" :"

)++)/5\$=")6" I c: "\*" + "% "\*" )2+\$&Q)/h" < \$/ .: >: F5\$ "0\$=\$&)." \* )U" I , 0%&/ \$ 3 \$ , +"N2XX%&+"  
 ?\$ , +\$&"af \* IN? g>7"U5(/5"(6"&\$6X% , 6(Q.\$"0%&"&\$6X% , =( , ' "%"( 3 3 ( ' &)+( , "6+)+26"  
 \_2\$&(\$6"0&% 3 ".)U"\$ , 0%&/ \$ 3 \$ , +) ' \$ , /(\$67"5)6"\$cX\$&(\$ , /\$="f/ % , +( , 2%26" ) , ="=& 3 )+(/"  
 ( , /&\$)6\$6g"( , "( 3 3 ( ' &)+( , "6+)+26"=\$+\$& 3 ( , )+( , " \_2\$&(\$6"%9\$&"+5\$X)6+"0%2&"R\$)&6:""  
 8). 3 )+(\$& < \$/ .: 7"r"W:""F5\$ "9\$&(0(/)+( , "X&%/ \$66" )+"5\$ " \* IN ? "(6" +( 3 \$B( , +\$ , 6(9\$) , ="  
 +)h\$67"% , ")9\$&)' \$7"%9\$&"CD" 3 ( , 2+\$6"\$9\$ , "0%&"6( 3 X.\$&/ )6\$6:""Id. )" +r"C:""M , "6% 3 \$"  
 /)6\$67"U5\$&\$)"&\$9(\$U"%0"+5\$"( , =(9(=2).]6"X5R6(/)."0(\$"(6"&\$ \_2(&\$=7"+5\$"&\$9(\$U" 3 )R"  
 +)h\$"+U%=")R6"%&" 3 %&\$:""Id. )" +r"@:""M , ")==+(% , 7"+5\$ " \* IN ? "(6"2 , )Q.\$"+% "9\$&(0R"+5\$"  
 6+)+26"%0" 3 %6+"L:N:"/(+ (^\$ , 67"6( , /\$"+5\$(&"&\$/%&=6")&\$" , %+" /% , +) ( , \$="( , " 2 O 2 o i 2

- ++%&, \$R"#\$, \$&)."+"62X\$&9(6\$"), =("(&\$/"N+)+\$"%00(/&6"(", "+5\$(&"(3 3 ('&)+(%,"U%&h"  
)//%&=(, ' "+%0\$=\$&)..RB=\$+\$& 3 (, \$="X&(%&+(\$6:g" Arizona7"PD@@ " G \*"@SEYWEV7")+"pC:  
K(, )..R7"+5\$ " ?%2&+"65%2.= "/% , 6(=\$&"+5\$"/2 3 2.)+(9\$"(3 X) /+"%0"%+5\$&"6+)+\$6"  
X)66(, ' "6(3 (.)&". \$ '(6.)+(% , :"*See, e.g., Bonito Boats v. Thunder Craft Boats,*"ECW"  
L:N:"@E@7"@Y@a@WCW>"a/% , 6(=\$&(, ' "f1+m5\$X&%6X\$/"%0")..VD"N+)+\$6"\$6+)Q.(65(, ' "  
6(3 (.)&"I&2.\$6mg"(", "0(, =(, ' ".)U"X&\$ \$ 3 X+\$=>j"*accord North Dakota v. United States*7"  
EWV"L:N:"EPS7"EVC"a@WWD>"aH&\$ , , ) , "` :7" /% , /2&&(, ' ("X)&+"), =="(66\$, +(, ' ("X)&+>"  
a0(, =(, ' "6+)+\$. '\$ '(6.)+(% , "X&\$ \$ 3 X+\$="(, "X)&+"Q\$/)26\$="(00(/2.+(6\$X&\$6\$, +\$="fU%2.= "  
(, /&\$)6\$"\$cX%, \$, +)..R"(0)"==(+(% , )."N+)+\$6")=X+"\$\_2(9).\$, +"&2.\$6g"), =, %+(, ' "+5)+"  
62/5")", )+(% , BU(=\$"/% , 6(=\$&)+(% , "U)6"0%2, ="f=(6X%6+(9\$g"(", "*Pub. Utils. Comm'n of*  
*Cal.*7 SVV"L:N:"VSE7"VEVB EY"a@WVC>:" F5(6"/% , /&\$ , "(6'0)&"0&% 3 "6X\$/2.)+(9\$:"" # \$%&' ()"  
(6"+5\$0%2&+5"6+)+\$"+% "5)9\$X)66\$="0)&B&\$)/5(, ' "(3 3 ('&)+(% , "\$, 0%&/ \$ 3 \$, +' 3 \$)62&\$6"  
) , =)"0(0+57" - .)Q) 3 )7"5)6", %U"0%..%U\$="62(+:"" - .+5%2 ' 5"+5\$6(3 (.)&"6+)+\$.)U6"+5)+"  
X&\$/\$=\$=" 1 H"CT")&\$"+5\$&"/2&&\$ , +.R"\$ , e%(, \$="%&" , %+"R\$+"(, "\$00\$/"7"+5\$") /+2)."  
(3 X.\$ 3 \$ , +)+(% , "(, =(9(=2)..R") , =7"(, "X)&+(/2.)&7"U5\$, ") ' ' &\$ ' )+\$=7"U(.."02&+5\$&"  
Q2&=\$, "+5\$0\$=\$&)." ' %9\$&, 3 \$ , +]6"

=%/23\$, + k /%, =2/+ "U5(/5"=%\$6", %+"X&%9(=\$"626X(/(% , "%07"%&"X&%Q)Q.\$"/)26\$"+%"  
Q\$.(\$9\$)"X&%6%, "(6\$, ' ) '\$="(, ), R"2, .)U02."/% , =2/+: ""HR")..%U(, ' "62/5"=\$+\$, +(%, "  
U(+5%2+"626X(/(% , "%0"U&%, '=%(, '7" 3 2/5".\$66"/&(3(, .) )/+(9(+R7"N\$/+(%, "C"9(%.)+\$6"  
+5\$"K%2&+5" - 3\$, = 3\$, +:

**1. The Immigration Status Investigations Authorized By HB 87 Will Cause Unlawful Detentions**

H\$=&%/h"K%2&+5" - 3\$, = 3\$, +.)U"X\$& 3 (+6)"Q&(\$0"(, 9\$6+( ' )+%&R"6+%X"(0)", "  
%00(/\$&"5)6"f)"&\$)6%, )Q.\$"626X(/(% , "62XX%&+\$="QR")&+(/2.)Q.\$"0)/+6"+5)"/&(3(, .)"  
) /+(9(+R" 3 )R"Q\$")0%"+:g""*United States v. Sokolow*7"EWD"L:N:"@7"T"a@WCW>"a/(+(, ' "  
*Terry v. Ohio*7"SWP"L:N:"@7"SD"a@WYC>>:""F5\$"6+%X7"5%U\$9\$&7"f

N\$/+(%, "C"X&%9(=\$6"+5)+U5\$, " ), "%00(/\$&"6+%X6"), "(, =(9(=2)."Q)6\$="%, "  
 X&%Q)Q.\$"/)26\$"+%Q\$.(\$9\$"+5\$X&6%, "(6"\$, ' ) '\$="(, "/&(3(, .) )/+(9(+R7"(0"+5\$X&6%, "  
 0)(.6"+%X&%9(=\$"+5\$"%00(/\$&"U(+5)"6+)+\$B)XX&%9\$="(=\$, +(R"=%/23\$, "+5)+ "1H"CT"  
 =\$36"+%Q\$6200(/(\$, +"X&%%0"%0"(33('&)+(%, "6+)+267"+5\$"%00(/\$&"3)R7"Q)6\$="%, .R"% , "  
 +5\$.)/h"%0"62/5)"="%/23\$, +7"(, 9\$6+( ' )+\$"), ="f=\$&3(, \$g"+5\$X&6%, ]6"(33('&)+(%, "  
 6+)+26:" J : ? : # : - : "d"@TBYK&QDaQ>: " " J ¥ O i

1H"CT"=%\$6", %+"6\$+"), R"+(3\$".(3(+6"% , "+5\$(33('&)+(%, "6+)+26"(, 9\$6+( ' )+(%, 6"  
 +5)+"(+)2+5%&(^\$67"), ="5\$6\$"(, 9\$6+( ' )+(%, 6")&\$" '\$, \$&)..R".\$, '+5R: @P "" J , ")9\$&' \$7"

M v





=+\$,+(%, "+%" +5)"/(&/2 3 6+), /\$:"" #%, ^).\$^<\$/.:"r"@Yj"#)6/u,"<\$/.:"r"W:""K%&"  
 \$c) 3 X.\$7"X&6%, 6"=&(9(, ' "(, "#\$%&' ( )"U(+5)"9).(=" ; \$U" Z \$c(/%"%&" G)65(, '+%, "  
 =&(9&\$]6".(/\$, 6\$aU5(/5)&\$"(662\$="X2&62), "+%" +5%6\$"6+)+\$6].)U6"U(+5%2+)"  
 &\$\_2(&\$ 3 \$, "+%0"\$9(=\$, /\$%0".)U02."(3 3 (' &)+(%, "6+)+26>7"(, /.2=(, ' "\*" )U02."  
 8&\$ 3 ), \$, +" 4\$6(=\$, +6"%&"L:N:"/(^\$, 6".(h\$"8.).(, +(006"N(, ' 5"), ="8(v%, 7"U%2.="Q\$" 2,  
 )Q.\$"+% "X&%=2/\$)"6+)+\$B)XX&%9\$="(=\$, +(R"=%/2 3 \$, +"U5\$, "6+%XX\$=":"<\$/.:"%0"  
 I&, \$6+%8(v%, r"T7")+)/5\$=")6" I c:"@Ej <\$/.:"%0` )RX)2."N(, ' 5"r"E7")+)/5\$=")6" I c:"  
 @V:""N(3 (.)&.R7"X\$=\$6&(, 6"), ="X)66\$, ' \$&6(", "9\$5(/.\$6")&\$", %+"&\$\_2(&\$="QR".)U"+%  
 /)&&R"), R"(\$, +(0(/)+(%, "=%/2 3 \$, +7"Q2+"U%2.="Q\$"62Qe\$/+"%)")==(+(%, )."(, 9\$6+( ' )+(%, "  
 2, =\$&"N\$/+(%, "C"(0"+5\$R"=%", %+"X%66\$66"%&"5)9\$%", "+5\$ 3 )"6+)+\$B)XX&%9\$="(=\$, +(R"  
 =%/2 3 \$, +:"" - 6")&\$62.+7" 1 H"CT"62Qe\$/+6"\$9\$, "L:N:"/(^\$, 6"), =".)U02."(3 3 (' &), +6"%  
 X&%.%, '\$="=\$+\$, +(%, "X\$, =(, ' "(3 3 (' &)+(%, "6+)+26"9&(0(/)+(%, :"" #%, ^).\$^<\$/.:"r"@Vj"  
 #)6/u,"<\$/.:"r"@V:

- 6"=(6/266\$=")Q%9\$(", "N\$/+(%, "Ma - >aP>a/>7" 3 ), R"0%&\$(' , , )+(%, , ).6")2+5%&(^\$=" 2,  
 +% "Q\$"(, "+5\$L , (+\$="N+)+\$6"="", %+"X%66\$66"%&"5)9\$"&\$)=(.R")9)(.)Q.\$\_2).(0R(, ' "  
 (=\$, +(R"=%/2 3 \$, +6"&\$\_2(&\$="2, =\$&"d"@TBVB@DDaQ>a@BV>7"%&"), R"%+5\$&="%/2 3 \$, +)+(%, "  
 +5)+ "U%2.="=\$ 3 %, 6&)+\$"+5\$(&"(3 3 (' &)+(%, "6+)+267"62/5")6"+% "X&\$9\$, +"Q\$(, ' "62Qe\$/+=\$=" 2,  
 +%)")==(+(%, )."(, 9\$6+( ' )+(%, "2, =\$&"N\$/+(%, "C:""K%&"\$c) 3 X.\$7"8.).(, +(00""` ), \$"<%\$ "sPJ6"  
 X&\$6\$, /\$"(, "+5\$L , (+\$="N+)+\$6"(6h, %U, "+%" +5\$0\$=\$&).)2+5%&(+(\$6"), ="U5(.\$"65\$5)6"

,% "0%& 3 )."( 3 3 (' &)+(%, "6+)+267"0\$=\$&)."2+5%&+(\$6"5)9\$"=\$/(=\$="+%)..%U"5\$&"+%  
&\$ 3)(, (" ,"+5\$L , (+\$="N+)+\$6"2 ,+(.)+".\$)6+"Z)R"PD@P"+5&%2 ' 5"=\$0\$&&\$=")/+(% , :"  
1 %U\$9\$&7"65\$"=%\$6" , %+"X%66\$66"X)X\$&U%&h"=%/2 3 \$ , +( , ' "5\$&"6(+2)+(%, :""` ) , \$ "<%\$ "sP"  
<\$/ .:"r"T:""M , =(9(=2).6" .(h\$ "5\$&"U%2.="Q\$"62Qe\$/"+"+"X&% .% , ' \$"=\$+\$ , +(%, "2 , =\$&" 1 H"  
CT7"\$9\$ , "+5%2 ' 5"+5\$R")&\$" , %+"62Qe\$/"+"+"( 3 3 \$=( )+\$&\$ 3 %9)."QR"0\$=\$&)."2+5%&+(\$6"  
) , ="5\$&\$"(6" , %"\$9(=\$ , /%"%0"/&( 3 ( , .) )/+(9(+R"e26+(0R( , ' " ) , R")==(+(% , .) ) , ( , 9\$6+( ' )+(% , :

**3. The Practical Effects of HB 87’s Arrest Provisions are Serious**

1 H"CT"U(.."/)26\$"U(=\$6X&\$)=") , ="6( ' , (0(/) , +"K%2&+5" - 3 \$ , = 3 \$ , +"9(%.)+(% , 6"  
(0)..%U\$="+%" ' %" ( , +% "\$00\$/"+"N\$/"+(% , "C]6")2+5%&(^)+(%, "0%&"X%.(/"\$"+%2 , =\$&+)h\$"  
( 3 3 (' &)+(%, " , 9\$6+( ' )+(% , 6)XX.(\$6"+%"6(+2)+(%, 6( , "U5(/5)" , "%00(/&\$"5)6"X&%Q)Q.\$"  
/)26\$+"Q\$.(\$9\$)"X\$&6% , "(6"/% 3 3 (+( , ' " ) , R"/&( 3 ( , .) "9(%.)+(% , 7"&\$ ' )&=. \$66"%0"5%U"  
3 ( , %&:"" # % , ^) . \$ ^ "<\$/ .:"r"@Vj" # )6/u , " <\$/ .:"r"@E:""M , "#\$%&' ( )7") .."&)00(/"9(%.)+(% , 67"  
QAR=( , ' " 3 ( , %&"9(%.)+(% , 6"62/5")6"6X\$\$=( , ' 7"0)(~~DIS~~%"Y&%X\$&AR"6 ( 2 , h a )" +2&D"%"&" oDJ om  
e)RU).h( , ' 7")&\$"/&( 3 ( , .) "9(%.)+(% , 6:""



+%"9\$&(0R)" , "( , =(9(=2).]6"(3 3 ('&)+(%, "6+)+26"U5\$, "+5\$"( , =(9(=2)."6"2 , )Q.\$"+%"  
X&%=2/(\$f)"9).(=#\$%&' ( )"=&(9\$&]6".(/\$, 6\$g"%&"/\$&+)( , "%+5\$&"=%/2 3 \$ , +6"+5)"  
f&\$ \_2(&\$1m"X&%%0"%0". \$ ' )."X&\$6\$, /\$( , "+5\$L , (+\$="N+)+\$6"Q\$0&\$"(662) , /\$:g"" J : ? : # : - :  
d"@TBVB@DDaQ>: @E7@V"" Z ) , R"X\$%X.\$"+&)9\$."U(+5)"9).(="=&(9\$&]6".(/\$, 6\$")6"+5\$(&"% , .R"  
0%& 3 "%0"(=\$ , +(0(/)+(%, 7"R\$+"6% 3 "\$6+)+\$6 k /2&&\$ , +.R" ; \$U" Z\$c(/%) , =" G)65( , '+% , k  
(662\$"=&(9\$&]6".(/\$, 6\$6"U(+5%2+"&\$ \_2(&( , 'X&%%0"%0"0\$=\$&)." (3 3 ('&)+(%, "6+)+26: @Y""  
F5267").+5%2' 5"# \$%&' ( ) , 6"/ ) , "26\$"+5\$(&"=&(9\$&]6".(/\$, 6\$6"+%)9%(=") , "(3 3 ('&)+(%, "  
=\$+\$& 3 ( , )+(%, 7"+&)9\$.\$&6"0&% 3 "/\$&+)( , "%+5\$&"6+)+\$67"( , /.2=( , 'X\$%X.\$"0&% 3 " ; \$U"  
Z\$c(/%) , =" G)65( , '+% , 7"62/5")6"8.)( , +(006"8(v% , ") , ="N( , ' 57"/ ) , , %+"26\$"+5\$(&"9).(="6+)+\$"  
6+)+\$"=&(9\$&]6".(/\$, 6\$6"0%&"5\$6) 3 "\$X2&X%6\$:"M , 6+\$)=7"+5%6\$"%2+B%0B6+)+\$"+&)9\$.\$&6  
U(..0)/\$")==(+(% , )."6/&2+( , R"QR" # \$%&' ( )"X\$)/\$"%00(/\$&6") , ="U(..Q\$"\$00\$/+(9\$.R"

=====

&\$\_2(&\$="+%"%Q+)(, ), ="/)&&R")==(+(% , )."=%/2 3 \$ , +)+(%, ")//X+)Q.\$"2, =\$&" 1 H"CT"  
U5(.\$+&)9\$. (, ' "(, "#\$%&' ( ):""See"N(, ' 5"<\$/.:"rr"P7"Vj"8(v%, "<\$/.:"rr"P7"T:""F5(6"  
Q2&=\$, "U(.."0%&/\$"8.) (, +(00"N(, ' 5"+%".(3 (+5(6"=&(9(, ' "(, "#\$%&' ( )"0" 1 H"CT"+)h\$6"  
\$00\$/+:""See N(, ' 5"<\$/.:"r"Y:"" - .+5%2 ' 5"+5\$&(' 5"+%"+&)9\$."=%\$6", %+" ' 2)&), +\$\$")//66"  
+%) , R"f6(, ' .\$" 3 %=\$"%0"+&), 6X%&+)+(%, 7g"John Doe No. 1 v. Ga. Dep't of Pub. Safety7"  
@ET"K:"N2XX:"P="@SYW7"@STV"a ; :<:"#):"PDD@>7" 1 H"CT]6"Q2&=\$, "%, "+&)9\$.\$&6"0&% 3 "  
G)65(, '+%, ") , =" ; \$U"Z\$c(/%)XX.(\$6"&\$ ' )&=.\$66"%0" 3 %=\$"%0"+&)9\$." , ="(, "0)/+"  
&\$)/5\$6"Q\$R% , ="&), 6X%&+)+(%, :"" - //%&=(, ' "+%"+6"X.) (, ".), ' 2)' \$7"NS/+(%, "C")XX.(\$6"  
+%) , R"X\$)/\$"%00(/\$&"(, 9\$6+( ' )+(%, 7"U5\$+5\$&"+5\$"(, 9\$6+( ' )+(%, "%//2&6"% , "Z - 4F - 7"% , "  
+5\$"6(=\$U).h7"0%..%U(, ' ")&%2+(, \$"+&)00(/"6+%X7"%&"(, "6% 3 \$%, \$]6"5% 3 \$:"" J : ? : # : - : "d"  
@TBVB@DDj"see also"N(, ' 5"<\$/.:"r"E:"

&X)66"+5&%2 ' 5"\$9\$&R"X)&+"%0"1+5\$L , (+\$="N+)+\$6m"U(+5%2+( , +\$&&2X+(% , 7")6"0&\$\$.R")6( , "  
%2&%U , "N+)+\$6:g""Crandall v. Nevada7"TS"L:N:"SV7"EW"a@CYC>:

1 H"CT"02&+5\$&"9(%.)+\$6"+5\$&"(' 5+%"&)+9\$. "Q\$/ )26\$"+("X&\$662&\$6"%+5\$&"6+)+\$6"+%  
.\$' (6.)+\$"( , "&\$6X% , 6\$"6%"5)+"+5\$(&"/(+(^\$, 6"=%" , %+"0)/\$"=(6/&(3 ( , )+%&R"+&\$)+ 3 \$ , +"( , "  
#%\$&' ( ):""See Austin7"EPD"L:N:")+"YYBYT"a\$cX.) ( , ( , ' "+5)+62/5"X&\$662&\$%" , "%+5\$&"  
6+)+\$6"f/% 3 X%2 , =6g"+5\$"/% , 6+(2+(% , ) . "9(%.)+(% , >:"M , ")==+(% , 7" 1 H"CT"Q2&=\$ , 6"+5\$"  
)Q.(+R"%0"%+5\$&"6+)+\$6"+%"\$ , ) /+"=&(9\$&"=%/ 2 3 \$ , +)+(% , "X%./((\$6")h( , "+%"5%6\$"( , " ; \$U"  
Z\$c(/%) , =" G)65( , '+% , "QR"/&\$)+ ( , ' ")X\$ , ) . +R"0%&"5%6\$"6+)+\$6]"&\$6(=\$ , +6"U5%"+&)+9\$ . "  
( , "#%\$&' ( ):""See id.")+"YYY:""HR"/&\$)+ ( , ' ")=(6/&(3 ( , )+%&R"/.) 66(0(/)+(% , "0%&"  
+&)+9\$.\$&6"0&% 3 "/\$&+)( , "6+)+\$67" 1 H"CT"( , +\$&0\$&\$6"U(+5"+5%6\$"6+)+\$6]"6%9\$&\$(' , "X%US&"+"%  
&\$' 2.)+\$"(662) , /\$"%0"+5\$(&"%U , "=&(9\$&]6".(/\$ , 6\$6:""

1 H"CT]6"=(00\$&\$ , +)."+&\$)+ 3 \$ , +"%0"+&)+9\$.\$&6"Q)6\$=" , "+5\$(&"6+)+\$]6"=&(9\$&]6"  
./(\$ , 6\$X%./((\$6"/) , , %+"U(+56+), ="6&(/+"6/&2+( , R"Q\$/ )26\$"+("6" , %+" , )&&%U.R"+)(.%&\$=" "  
+%"+5\$X2&X%6\$%0"+5\$".)U k ( 3 3 (' &)+(% , "&\$' 2.)+(% , " ) , ="\$ , 0%&/ \$ 3 \$ , +7"see supra  
N\$/+(% , "Ma - >a@> k \$9\$ , "(0"62/5)"X2&X%6\$"/%2.="Q\$"=\$\$ 3 \$=")"/% 3 X\$..( , ' "6+)+\$"  
( , +\$&\$6+"aU5(/5"+("6" , %+>:" 1 H"CT"X\$ , ) . (^\$6").."+&)+9\$.\$&6"/)&&R( , ' "=&(9\$&]6".(/\$ , 6\$6"  
0&% 3 "/\$&+)( , "6+)+\$67"( , /.2=( , ' "L:N:"/(+ (^\$, 6" ) , =".)U02..R"X&\$6\$ , +(3 3 (' & , +67") , ="  
62Qe\$/+6"+5\$ 3 "+%( , 9\$6+( ' )+(% , " ) , ="X&% .% , '\$"=\$+\$ , +(% , "+%"U5(/5"X\$%X.\$"U(+5"

./\$,6\$6"0&% 3 "#\$%&'()"),="5\$&"6+)\$6")&\$",%+"62Qe\$/+:"F5(6"=(6/&(3(,)+(%,"9(%.)+\$6"  
+5\$&('5+"%"+&)9\$.:"

**D. HB 87 Violates the Separation-of-Powers Safeguards of the Georgia Constitution**

F5\$6U\$\$X(,"=(6/&\$+(%,"=\$.\$')+=\$="+5\$"-++%&,\$R"#\$, \$&)."QR"NS\$/+(%,"@W"%0"

1H"CT"9(%.)+\$6"+5\$"#\$%&'()"?%,6+(+2+(%,]6"6\$X)&)+(%,B%0BX%U\$&6"'2)&),+\$\$:"

N\$/+(%,"@W"X&%5(Q(+6"+5\$"))//\$X+),/\$"0"),"(=\$,+0(/)+(%, "=%/23\$,+"5)+"(6"      ħ      â      b



+%"U5)+="%/2 3 \$,+6"65).. "Q\$"/% ,6(=\$&\$="f6\$/2&\$") ,="9\$&(0()Q.\$g"6%.\$R"U(+5"+5\$"  
 - ++%&,\$R"#,\$,\$&).]6"2, &\$9(\$U)Q.\$="(6/&\$+(% ,:" Z %&\$%9\$&7"+5\$" - ++%&,\$R"#,\$,\$&).]6".(6+ "  
 (6"\$c/.26(9\$A",%" 3 )+\$&"U5)+)2+5%&(R"(662\$6)" '(9\$, "=%/2 3 \$,+7") ,=" ,%" 3 )+\$&"5%U"  
 \$)6R"(+"(6+"9\$&(0R7"(0"(6",%+" ,"+5\$" - ++%&,\$R"#,\$,\$&).]6".(6+("(6",%+" )"f6\$/2&\$") ,=" "  
 9\$&(0()Q.\$="%/2 3 \$,+g"2,=\$&"#%&'()".)U:

F5\$"#%&'()" ?% ,6+(+2+(% , "X&%5(Q(+6"X&\$/(6\$.R"+5(6"+RX\$"%0"=\$.\$ ')+(%,:" fF5\$"  
 .\$ '(6.)+(9\$7"e2=(/().7") ,="c\$/2+(9\$X%U\$&6"65).. "0%&\$9\$&"&\$ 3 )(,"6\$X)&)+\$") ,=" "  
 =(6+(, /+j") ,=" ,%X&6% ,="(6/5)&' (, ' "+5\$="2+(\$6"%0"% ,"\$65)..")+"5\$6) 3 \$"+(3 "\$c&/(\$"

85)& 3 )/R"+%"+5\$&\$)0+\$&")2 ' 3 \$ , "+5\$".)U]6"%&(' ( , )."(6+"%0"X&%5(Q(+\$/5\$ 3 (/).67"U)6"  
) , "2 , /% , 6+(+2+(% , )."=\$.\$ ' )+(% , "%0"X%U\$&:""F5\$"?%2&+"\$cX.)(\$="+5)+fU5(.\$"+5\$"  
#\$ , \$&)." - 66\$ 3 Q.R" 3 )R"=\$.\$ ' )+\$"/\$&+)( , "X%U\$&6"+%"+5\$"\$c\$/2+(9\$)Q& ) , /5"%0"  
'%9\$& , 3 \$ , +( , "%&=\$&+"%"/)&&R"%2"+5\$".)U")6"\$ , )/+=\$"QR"+5\$"\$ , \$&)." - 66\$ 3 Q.R7g"+5\$"  
#\$ , \$&)." - 66\$ 3 Q.R"/%2.=" , %+"f=\$.\$ ' )+\$":":":+5\$")2+5\$&+(R"+%"+=\$&\$ 3 ( , "\$U5)+)/+6"a+5\$"  
X%66\$66(% , "%0"62/5"62Q6+ ) , /\$6>"U"2.=" /% , 6+(+2+\$")/&( 3 \$:g""Id. )" + "ECE:"""

N\$/+(% , "@W"%0" 1 H"CT"6200\$&6"0&% 3 "+5\$")6) 3 \$"/% , 6+(+2+(% , )."=\$0\$/+"QR"  
\$cX) , =( , "'"+5\$X2&X%&+\$=")2+5\$&+(R"%0"+5\$ - ++& , \$R"#\$ , \$&)."Q\$R% , ="+5)+%0" 3 \$&\$R"  
f/)&&R( , "'%2"+5\$".)Ug"+%"+5\$&%. "\$%0"=\$&\$ 3 ( , ( , "'"+5\$9\$&R"/% , =2/+5)+U(.. "\$+5\$&  
Q\$".)U02."%&"2 , .)U02.: ""See id."j"Long v. State7"PDP"#):"PSV"a@WET">a=\$.\$ ' )+(% , "+%"  
/%2 , +(\$6"%0")2+5\$&+(R"+%6\$+"6X\$\$=".( 3 (+6"2 , /% , 6+(+2+(% , ).>j"Howell v. State7"PSC"#):"  
WV"a@WTY">a6+)+2+\$X&%9(=( , "'+5)+f1)m , R"X\$&6% , "%&"/%&X%&)+( , "U5%"65)..9(%.)+\$"  
) , R"%0"+5\$&2.\$6"%&"&\$ ' 2.)+(% , 6"X&% 3 2. ' )+\$="QR"+5\$"/% 3 3 (66(% , "1%0" ; )+2&)." "  
4\$6%2&/6m"65).. "Q\$"' 2(,+R"%0")" 3 (6=\$ 3 \$) , %&g"U)6") , "f2 , /% , 6+(+2+(% , )."=\$.\$ ' )+(% , "  
%0". \$ '(6.)+(9\$")2+5\$&+(Rg"+%"+5\$"/% 3 3 (66(% , :>:""HR"=\$.\$ ' )+( , "'"+5\$ - ++& , \$R"  
#\$ , \$&)." +5\$X%U\$&+"=\$&\$ 3 ( , "\$U5(/5"=%/2 3 \$ , +6)"&\$"f6\$/2&\$") , ="9\$&(0()Q.\$7g") , ="  
U5(/5"QR"\$c/.26(% , ")&\$"X&%5(Q(+\$/0&% 3 "2

**II. PLAINTIFFS WILL SUFFER IRREPARABLE HARM IF HB 87 IS ALLOWED TO GO INTO EFFECT**

8.) (, +(006"U(.."6200\$&"(&&\$X)&)Q.\$"5)& 3 "(0" 1 H"CT"(6" , %+"\$, e% (, \$=: "f - , "(, e2&R"(6" (&&\$X)&)Q.\$"(0"(+/) , , %+"Q\$"2, =%, \$"+5&%2' 5" 3 %, \$+)&R"&\$ 3 \$=( \$6g"%&"f(0"=) 3 ) ' \$6" U%2.= "Q\$"=(00(/2.+ "%&"( 3 X%66(Q.\$"+%/)/. /2.)+\$:g"*Scott v. Roberts*"Y@P"K:S="@PTW7" @PWV"a@@+5"? (&:"PD@D>"a/(+)(% , 6" ) , =" \_2%+)(% , 6"% 3 (+\$=>:" 1 )& 3 "&\$62.+ (, ' "0&% 3 "+5\$ " \$, 0%&/ \$ 3 \$, +"%0" ) .)U"+5)+9(%.)+\$6"+5\$ "N2X&&\$ 3 )/R"?.)26\$(6" ' \$, \$&)..R"(&&\$X)&)Q.\$7" *see, e.g. Morales v. Trans World Airlines*"VDE"L:N:"STE7"SC@a@WWP>j"Arizona7" PD@@ "G \*"@SEYWEV7")+ "p@W7")6")&\$%"+5\$&"/% , 6+(+2+(% , ) . "5)& 3 6"+5)+)&\$" (, +) , ' (Q.\$" (, , )+2&\$7 *KH Outdoor, LLC v. Trussville*"EVC"K:S="@PY@7"@PTP"a@@+5"? (&:"PDDY>:

M0" 1 H"CT" ' %\$6" (, +% "\$00\$/+7" ("U(.." ( 3 3 \$=( )+\$ .R"62Qe\$/+ " , 2 3 \$&%26"X.) (, +(006" ) , =" 3 \$ 3 Q\$&6"%0"X.) (, +(00"%&' ) , (^)+(%, 6"+%" +5\$"&(6h"%0"2 , /% , 6+(+2+(% , ) .) , =" \$c+\$ , =\$=" =\$+\$ , +(%, "U5(.\$"X%.( /"\$%00(/&\$6" (, 9\$6+( ' )+\$" ( 3 3 ( ' &)+(%, "6+)+26:"<\$/ .:"%0" I .(6\$%" Z\$=(, ) "r"C7")+)/5\$=")6" Ic:"PEj"<\$/ .:"%0" 1 )&&(6"4)R, %&"rr"EBY7")+)/5\$=")6" Ic:"PV:" 8.) (, +(006")&\$")=(9\$&6\$ " '&%2X"%0" (, =(9(=2).6" ) , ="%&' ) , (^)+(%, 6"U5%"&\$X&\$6\$, +"&)/(.) " 3 (, %&+(\$67" , )+(%, ) .)%&( ' (, " 3 (, %&+(\$67" (, =(9(=2).6"U5%"6X\$)h"0%&\$ ( ' , .) , ' 2) ' \$6"%&" U5%"5)9\$")//\$, +6"U5\$, "6X\$)h(, ' " I , ' .(657" ) , =(, =(9(=2).6"U5% .)/h"+5\$ "\_2).(0R(, ' " (= \$, +(R"=%/2 3 \$, +6"\$ , 2 3 \$&)+\$=" (, " 1 H"CT:"M0" 1 H"CT"+)h\$6"\$00\$/+7"8.) (, +(006"U(.."Q\$" )+"&(6h"%0"=(6/&( 3 (, )+%&R"+&\$)+ 3 \$, +7"2, U)&& ) , +\$="X%.( /"\$6/&2+(, R7"X&% .% , ' \$=" =\$+\$ , +(%, 67" ) , =" )&&\$6"+\$9\$&R"+( 3 \$"+5\$R"/% 3 \$" (, +% /% , +) /+"U(+5" # \$%&' ( ) .)U"



&\$X%&+(, '"/&(3 \$6"+%"+5\$X%./("\$%&")/+(, '")6"U(+, \$66\$67"+526"3 )h(, '+5\$ 3"92., \$&)Q.\$"  
+)&' \$+6"0%&"/&(3(, .)6"), ="2, =\$& 3(, (, 'X2Q./("6)0\$+R"(, "+5\$(&"/% 3 3 2, (+(\$6:""See  
#%, ^).\$^<\$/.:"rr"@DB@Ej"N 3 (+5"<\$/.:"rr WB@Ej"see also `), \$"<%\$"sP"<\$/.:"r @@j"  
`%5, "<%\$"s@"<\$/.:"r @@j`%5, "<%\$"sP"<\$/.:"r Yj"K.%&\$6"<\$/.:"rr"@DB@Pj"; (/5%..6"  
<\$/.:"rr"@P7"P@j" I=U)&=6"<\$/.:"r W:""N% 3 \$"U(..)9%(="/% , +)/+"U(+5"X%./("\$) .+% '\$+5\$&"  
(0" 1H"CT" ' %\$6"(, +% "\$00\$/+:""See `), \$"<%\$"s@"<\$/.:"r Ej"`%5, "<%\$"s@"<\$/.:"r @@"  
F5\$6\$5)& 36")&\$" \_2(, +\$66\$, +(, ."\$c) 3 X.\$6"%0"(&&\$X)&)Q.\$5)& 3 "Q\$/)26\$"%0"+5\$(&"  
(, +), '(Q.\$"), ="2, \_2), +(0()Q.\$"), +2&\$:""See Trans World Airlines7"VDE"L:N:")+"SC@:"  
Z %&\$%9\$&7").. "8.)(+, (006"), ="# \$%&' ( ), 6"U(.."Q\$5)& 3 \$=")6".%/).")U"  
\$, 0%&/ \$ 3 \$, +"&\$6%2&/ \$6")&\$"=(9\$&+\$=")U)R"0&% 3"/&(3(, .).)U"\$, 0%&/ \$ 3 \$, +"+"  
\$00\$/+2)+\$ "1H"CT]6"6+)+26B9\$&(0(/)+(%, ") , =( 3 3 (' &)+(%, "\$, 0%&/ \$ 3 \$, +"X&%9(6(% , 6:""

0&\$\$=% 3 "%0" 3 %9\$ 3 \$ ,+) , ="+5\$(&"&\$=2/+(% , "( , "+&)9\$. "+%)9% (= "X% ./ \$" ( , +\$&&% ' )+(% , :'"

*See 8(v% , "<\$/.:"r Cj"N( , ' 5"<\$/.:"rr"EBTj Pro-Choice Network of W.N.Y. v. Project Rescue W.N.Y.*



'%9\$&, 3 \$, +]6")Q.(+R"+%"&\$ '2.)+\$"(3 3 ('&)+(%, ), ="/% , =2/+ "0%&\$(' , ")00)(&67") , ="





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*CKuck@immigration.net*  
*DConley@immigration.net*

*Attorneys for Plaintiffs*

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification to the following attorney for Defendants Deal, Olens, Reese, and Beatty, to whom a copy is also being hand-delivered today:

Devon Orland  
Office of State Attorney General  
40 Capitol Square, S.W.  
Atlanta, GA 30334-1300  
dorland@law.ga.gov  
*Attorney for Defendants Deal, Olens, Reese and Beatty*

I hereby certify that a copy of the foregoing is being hand-delivered on this date to the following non-CM/ECF participant:

Falecia Stewart  
Executive Director, Housing Authority of Fulton County  
HAFC Headquarters  
4273 Wendell Drive  
Atlanta, GA 30336

This 8th day of June, 2011.

/s/ Michelle R. Lapointe